

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**R'KES STARLING, individually and on behalf of all others similarly situated**

*Plaintiff,*

**V.**

**PR ADVISORS, LLC D/B/A PINNACLE  
REALTY ADVISORS and  
RAM PROPERTIES, LLC**

***Defendants.***

**Civil Action No. 1:24-cv-000991-DII**

**DEFENDANT RAM PROPERTIES, LLC’S REPLY IN SUPPORT OF ITS MOTION TO  
DISMISS THROUGH JOINDER WITH AND ADOPTION OF DEFENDANT  
PR ADVISORS, LLC’S REPLY IN SUPPORT OF ITS MOTION TO DISMISS**

Defendant RAM Properties, LLC (“RAM”) hereby replies to Plaintiff R’Kes Starling’s (“Plaintiff”) Response in Opposition to Defendants’ Motion to Dismiss (**Dkt. 21**) (the “Response”) and would respectfully show the Court as follows:

**I. JOINDER WITH AND ADOPTION OF PR ADVISORS, LLC’S REPLY IN SUPPORT OF ITS MOTION TO DISMISS**

On behalf of the “National Do Not Call Registry Class,” Plaintiff makes the same allegations and asserts the same claim against Defendants RAM and PR Advisors, LLC for alleged violations of the Telephone Consumer Protection Act. On this day, January 29, 2025, Defendant PR Advisors, LLC filed its Reply in support of its Motion to Dismiss the Complaint (**Dkt. 24**) (“PR Advisors’ Reply”) pursuant to Rule 12(b)(1) and/or 12(b)(6) of the Federal Rules of Civil Procedure. Because the Defendants are similarly situated, RAM hereby joins and adopts PR

Advisors' Reply in its entirety and incorporates it fully into this Reply by reference. Fed. R. Civ. P. 10.

## **II. GROUNDS FOR DISMISSAL**

The same incurable defects in the Complaint urged by PR Advisors, LLC are equally applicable to RAM. Therefore, the Court should dismiss the Complaint against RAM in its entirety pursuant to Rule 12(b)(1) and/or 12(b)(6) of the Federal Rules of Civil Procedure for the same reasons set forth in PR Advisors' Motion and Reply.

WHEREFORE, PREMISES CONSIDERED, Defendant RAM prays that this Court grants its Motion, dismisses the Complaint in its entirety, and grants all other and further relief to which RAM may show itself entitled, whether at law or in equity.

Dated: January 29, 2025

Respectfully submitted,

By: /s/ Yusuf A. Bajwa

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*Attorneys for Defendant RAM Properties, LLC*

**CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing document was served this 29<sup>th</sup> day of January 2025 to all parties via PACER.

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/s/ Yusuf A. Bajwa  
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